

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

JAN 9 2003

UNITED STATES OF AMERICA)
v.) Case No. 1:18-MJ-10
JUSTICE TANISHA GREGG,)
Defendant.)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael E. Connolly, being duly sworn, depose and state as follows:

INTRODUCTION

1) I am a Special Agent with the Department of the Treasury, Office of Inspector General (“TOIG”) assigned to the Washington, DC headquarters. I have 17 years of experience in federal law enforcement, including working for the past 7 years as a Special Agent with TOIG. I previously served as a Special Agent for the United States Secret Service, the Department of Energy, and the Department of the Treasury, Inspector General for Tax Administration. My duties as a Special Agent for TOIG include conducting criminal investigations related to fraud against programs of the United States Department of the Treasury. I have also investigated cases involving identity theft and fraud, including bank, mail and wire fraud. I successfully completed the Criminal Investigator Training Program and the Inspector General Training Program at the Federal Law Enforcement Training Center in Glynn County, Georgia.

2) This affidavit is based on my personal knowledge, information conveyed to me by other government officials, and my review of records and documents obtained during the course of the investigation. This affidavit contains information necessary to establish probable cause, but does not include each and every fact known by me or known to the government.

3) This affidavit is submitted in support of a criminal complaint and summons charging that on or about June 4, 2015, in the Eastern District of Virginia, JUSTICE GREGG did conspire to commit bank fraud, in violation of 18 U.S.C. § 1344.

PROBABLE CAUSE

4) TOIG's investigation reveals that JUSTICE GREGG knowingly participated in a scheme to alter a U.S. Treasury check, deposit it in her account at TD Bank, N.A., and then withdraw the funds. TD Bank, one of the ten largest banks in the United States, is a federally chartered financial institution that is insured by the Federal Deposit Insurance Corporation.

5) In June 2015, U.S. Treasury check number 4030 43351590, issued to Uncharged Conspirator #1 ("UC-1") in the amount of \$16.00, was altered to \$8516.00, negotiated to GREGG, and deposited into GREGG's account. The United States Department of the Treasury, Bureau of the Fiscal Service ("BFS") confirmed that the check amount was altered.

6) A copy of check number 4030 43351590 shows that the check – reflecting an amount of \$8,516 – was deposited on June 4, 2015, into GREGG's bank account.

7) From on or about June 4, 2015, through on or about June 10, 2015, nearly the entire balance of GREGG's TD Bank account was drawn down via numerous ATM withdrawals and point of sale transactions.

8) Records of GREGG's account show that two \$2,000 cash withdrawals, totaling \$4,000, were made on June 5, 2015.

9) On June 6, 2015, two United States Postal Money Orders were purchased in Alexandria, Virginia, in the amounts of \$950 and \$1,000, respectively, using GREGG's debit card for payment.

10) On June 9, 2015, Gregg's account had a balance of only \$2.08.

11) On June 10, 2015, BFS charged back U.S. Treasury check number 4030 43351590 to TD Bank because BFS determined that the check was fraudulent or altered.

12) On June 25, 2015, TD Bank charged off GREGG's account as a loss of \$8,586.92.

13) On February 21, 2017, a Fairfax County Police Department Detective and I met with GREGG in a voluntary, non-custodial interview. After speaking briefly with GREGG and her mother in the doorway of her home, GREGG agreed to step out of her home and answer questions. During the interview, GREGG provided the following information:

(a) GREGG was approached by a "friend" named Dante (last name unknown), who asked if GREGG would like to make a little money doing a "money flip" with Dante's unknown friend ("UNSUB1"). GREGG described UNSUB1 as a black male, approximately 5'6", with dark skin and an African accent.

(b) Dante told GREGG that she could "flip some money", but had to split it.

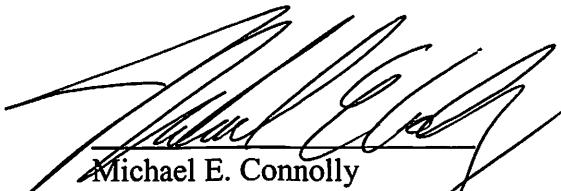
(c) GREGG said she understood that the "money flip" would involve "using her account to deposit a check and getting a cut of the money." GREGG agreed to participate in the money flip because she did not have a job and needed money.

(d) GREGG said she gave UNSUB1 her TD Bank routing number, her account number, ATM card, and ATM personal identification number.

- (e) A few days after providing this information to UNSUB1, GREGG noticed that the balance of her TD Bank account was more than \$8,000.
- (f) The signature on the back of the \$8,516 U.S. Treasury check is GREGG's signature.
- (g) After the check was deposited, UNSUB1 told GREGG that they had gone to the bank "to change the information" on her account. UNSUB1 and a second man picked GREGG up and drove her to the bank. During her meeting with investigators in February 2017, GREGG was shown a picture of UC-1 and identified him as the second individual in the car. GREGG, UNSUB1, and UC-1 arrived at the bank together, and GREGG withdrew \$2,000. After the withdrawal, GREGG asked UNSUB1 and UC-1 about her cut of the money, and they gave her \$100.
- (h) UNSUB1 and UC-1 then took GREGG to U.S. Post Offices in Alexandria, VA, and had her purchase two Postal Money Orders in the amounts of \$1,000 and \$950.

CONCLUSION

Based on the about set of facts and circumstances, I submit that there is probable cause to believe that on or about June 4, 2015, through on or around June 10, 2015, in the Eastern District of Virginia, JUSTICE GREGG conspired to commit bank fraud, in violation of 18 U.S.C. § 1344.



Michael E. Connolly
Special Agent
U.S. Department of Treasury, Office of Inspector General

Sworn to and subscribed before me
on January 9, 2018,
in Alexandria, Virginia.

/s/ JFA
John F. Anderson
~~United States Magistrate Judge~~
The Honorable John F. Anderson
United States Magistrate Judge